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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all similarly  
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF ALEXANDER  
FRAWLEY IN OPPOSITION TO  
GOOGLE'S MOTION *IN LIMINE*  
NUMBER 3 RE: 104 DOCUMENTS  
GOOGLE DEEMS IRRELEVANT**

Judge: Hon. Yvonne Gonzalez Rogers

**DECLARATION OF ALEXANDER FRAWLEY**

I, Alexander Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York and admitted *pro hac vice* for this case. Dkt. 97. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this declaration in opposition to Google's Motion *In Limine* Number 3 Re: 104 Documents that Google deems irrelevant.

3. Attached hereto as Exhibit 1 is a true and correct copy of a document Google produced in discovery labeled GOOG-CABR-04195517.

4. Attached hereto as Exhibit 2 is a true and correct copy of Google's Response to Interrogatory No. 29.

5. Attached hereto as Exhibit 3 is a true and correct copy of a document Google produced in discovery labeled GOOG-BRWN-00169228.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of October, 2023, at New York, New York.

/s/ Alexander Frawley